

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

OSURE BROWN, on his own behalf and  
on behalf of other similarly situated  
persons,

Plaintiff,

v.

TRANSWORLD SYSTEMS, INC., *et al.*,

Defendants.

No. 2:20-cv-00669-RSL

STIPULATION AND ORDER TO  
ALTER STRUCTURE OF MOTION-  
TO-DISMISS BRIEFING

**STIPULATION**

After the Parties' meet and confer on May 20, 2020, pursuant to Local Civil Rules 7(d)(1) and 10(g), and for the following reasons, Plaintiff Osure Brown ("Plaintiff") and Defendants Transworld Systems Inc. ("TSI"), Patenaude & Felix, APC ("P&F"), U.S. Bank National Association ("U.S. Bank"), National Collegiate Student Loan Trust 2004-1, National Collegiate Student Loan Trust 2004-2, National Collegiate Student Loan Trust 2005-1, National Collegiate Student Loan Trust 2005-2, National Collegiate Student Loan Trust 2005-3, National Collegiate Student Loan Trust 2006-1, National Collegiate Student Loan Trust 2006-2, National Collegiate Student Loan Trust 2007-1, and National Collegiate Student Loan Trust 2007-2 (collectively, "the Trusts," and together with TSI, P&F, and U.S. Bank, "Defendants"), hereby

1 stipulate and agree to structure the briefing on the Defendants' anticipated motions to dismiss in  
2 accordance with the agreement below.

3 The Defendants anticipate filing separate motions to dismiss. The Parties agree that, in  
4 order to avoid needless duplication of arguments, the Defendants shall be permitted to file a joint  
5 brief in support of those motions in order to address arguments common to all Defendants. Such  
6 joint brief shall not exceed thirty (30) double-spaced pages. Each individual Defendant shall also  
7 each be permitted to file a separate motion-to-dismiss brief addressing arguments relevant to the  
8 individual Defendant. Such individual briefs shall not exceed sixteen (16) double-spaced pages  
9 each. Plaintiff's opposition to the joint brief shall not exceed thirty (30) double-spaced pages and  
10 the opposition to each individual brief shall not exceed sixteen (16) double-spaced pages.  
11 Defendants' joint reply brief shall not exceed fifteen (15) double-spaced pages, and the reply in  
12 support of each individual Defendant's brief shall not exceed eight (8) double-spaced pages.

13 Such a stipulated briefing structure will save the Court and the Parties unnecessary time  
14 and effort with respect to briefing on overlapping or identical issues. No prior requests to alter  
15 the briefing structure have been made. Such a stipulation does not alter or modify any other  
16 rights or responsibilities of the Parties except as stated herein permitted by law or under the  
17 Federal Rules of Civil Procedure, or the Local Civil Rules.

18 DATED: May 26, 2020.  
19  
20  
21  
22  
23  
24  
25  
26

HENRY & DEGRAAFF, P.S.

By: /s/ Christina L. Henry  
Christina L. Henry, WSBA No. 31273  
787 Maynard Ave S  
Seattle, WA 98104  
Telephone: 206.330.0595  
Facsimile: 206.400.7609  
[chenry@HDM-legal.com](mailto:chenry@HDM-legal.com)

*Counsel for Plaintiff*

BORISON FIRM, LLC

By: /s/ Scott Borison  
Scott Borison, *Pro Hac Vice*  
1900 S. Norfolk St., Suite 350  
San Mateo, CA 94403  
[scott@borisondfirm.com](mailto:scott@borisondfirm.com)

*Counsel for Plaintiff*

CORR CRONIN LLP

By: /s/ Emily J. Harris  
Emily J. Harris, WSBA No. 35763  
Benjamin C. Byers, WSBA No. 52299  
1001 Fourth Avenue, Suite 3900  
Seattle, WA 98154  
[eharris@corrchronin.com](mailto:eharris@corrchronin.com)  
[bbyers@corrchronin.com](mailto:bbyers@corrchronin.com)

*Attorneys for Transworld Systems Inc.*

CONSUMER LAW CENTER, LLC

By: /s/ Phillip Robinson  
Phillip Robinson, *Pro Hac Vice*  
8737 Colesville Road, Suite 308  
Silver Spring, MD 20910  
[phillip@marylandconsumer.com](mailto:phillip@marylandconsumer.com)

*Counsel for Plaintiff*

SESSIONS, FISHMAN, NATHAN & ISRAEL

By: /s/ Bryan C. Shartle, Esq.  
Bryan C. Shartle, *Pro Hac Vice*  
Justin Homes, *Pro Hac Vice*  
Bradley St. Angelo, *Pro Hac Vice*  
3850 North Causeway Boulevard, Suite 200  
Metairie, LA 70002  
[bshartle@sessions.legal](mailto:bshartle@sessions.legal)  
[jhomes@sessions.legal](mailto:jhomes@sessions.legal)  
[bstangelo@sessions.legal](mailto:bstangelo@sessions.legal)

*Attorneys for Transworld Systems Inc.*

JONES DAY

By: /s/ Albert J. Rota  
Albert J. Rota, *Pro Hac Vice*  
2727 North Harwood St.  
Dallas, TX 75201  
[ajrota@jonesday.com](mailto:ajrota@jonesday.com)

*Attorneys for U.S. Bank National Association*

PERKINS COIE LLP

LEE SMART, P.S., INC.

By: /s/ Kristine E. Kruger  
Kristine E. Kruger, WSBA No. 44612  
1201 Third Avenue, Suite 4900  
Seattle, WA 98101  
Telephone: 206.359.8000  
Facsimile: 206.359.9000  
KKruger@perkinscoie.com

By: /s/ Marc Rosenberg  
Marc Rosenberg, WSBA No. 31034  
1800 One Convention Place  
701 Pike St.  
Seattle, WA 98101  
Mr@leesmart.com

*Attorneys for Defendants U.S. Bank National  
Association, National Collegiate Student Loan  
Trust 2004-1, National Collegiate Student  
Loan Trust 2004-2, National Collegiate  
Student Loan Trust 2005-1, National  
Collegiate Student Loan Trust 2005-2,  
National Collegiate Student Loan Trust 2005-  
3, National Collegiate Student Loan Trust  
2006-1, National Collegiate Student Loan  
Trust 2006-2, National Collegiate Student  
Loan Trust 2007-1, National Collegiate  
Student Loan Trust 2007-2*

*Attorneys for Patenaude & Felix, APC*

**ORDER**

IT IS SO ORDERED.

In order to avoid needless duplication of arguments, the Defendants shall be permitted to file a joint brief to address motion-to-dismiss arguments common to all Defendants. Such joint brief shall not exceed thirty (30) double-spaced pages. Each individual Defendant shall also each be permitted to file a separate motion-to-dismiss brief addressing arguments relevant to the individual Defendant. Such individual briefs shall not exceed sixteen (16) double-spaced pages each. Plaintiff's opposition to the joint brief shall not exceed thirty (30) double-spaced pages and the opposition to each individual brief shall not exceed sixteen (16) double-spaced pages. Defendants' joint reply brief shall not exceed fifteen (15) double-spaced pages, and the reply in support of each individual Defendant's brief shall not exceed eight (8) double-spaced pages.

No prior requests to alter the briefing structure have been made. This order does not alter or modify any other rights or responsibilities of the Parties except as stated herein permitted by law or under the Federal Rules of Civil Procedure, or the Local Civil Rules.

DATED this 27th day of May, 2020.



Honorable Robert S. Lasnik